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February 23, 2023

**VIA ECF**

The Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Caleb Anderson, et al. v. Orbit Furniture, et al.*  
Case No. 22-cv-06919 (KAM)(RER)

Dear Judge Matsumoto,

We represent the defendants, Orbit Furniture Inc., Orbit Furniture NY LLC, Orbit Furniture Brooklyn Way, Inc., and Vladimir Bar (collectively, the “Defendants”) in the above-referenced action.

In accordance with Your Honor’s Individual Motion Practices and Rules, the Defendants collectively make this motion by letter to respectfully request an extension of time to answer or otherwise respond to the Complaint (ECF No. 1) in this action. The Defendants’ time to answer or otherwise respond to the Complaint is currently set for March 1, 2023. This is the first request for an extension of time to answer or respond. The Defendants respectfully requests that their time to answer or otherwise respond to the Complaint be extended up to and including March 23, 2023. Opposing counsel has been advised of this request and has agreed to extend the professional courtesy of consenting to the Defendants’ request for an extension of time.

We thank Your Honor for consideration.

Respectfully Submitted,

By: SAUCHIK & GIYAU, P.C.  
/s/\_\_\_\_\_  
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cc: all counsel, via ECF